

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell  
and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends Amy  
Manzelli and Chad Turmelle,

Plaintiffs.

v.

Civil Action No. 1:24-cv-00251

Frank Edelblut, *in his official capacity as Commissioner of  
the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro,  
Rajesh Nair, James Fricchione, and James Laboe, *in their  
official capacities as members of the New Hampshire  
State Board of Education;*

Pemi-Baker Regional School District;

Lisa Ash, Bernice Sullivan, Sheila Donahue, Tony Torino,  
Carolyn Varin, Peter Jackson, Phil McCormack, Greg  
Aprilliano, Bonnie Acton, Barbara Noyes, Paul Ciotti,  
Sam Brickley, and Paul Pizzano, *in their official  
capacities as members of the Pemi-Baker Regional School  
Board;*

Pembroke School District; and

Andrew Camidge, Gene Gauss, Kerri Dean, and Melanie  
Camelo, *in their official capacities as members of the  
Pembroke School Board,*

Defendants.

**PLAINTIFFS PARKER TIRRELL AND IRIS TURMELLE'S  
MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff Parker Tirrell, by her next friends and parents Sara Tirrell and Zachary Tirrell, moves this Court to preliminarily enjoin Defendants Frank Edelblut, in his official capacity as Commissioner of the New Hampshire Department of Education; Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Laboe, in their official capacities as members of the New Hampshire State Board of Education; Pemi-Baker Regional School District; and Lisa Ash, Bernice Sullivan, Sheila Donahue, Tony Torino, Carolyn Varin, Peter Jackson, Phil McCormack, Greg Aprilliano, Bonnie Acton, Barbara Noyes, Paul Ciotti, Sam Brickley, and Paul Pizzano, in their official capacities as members of the Pemi-Baker Regional School Board; and their employees, agents, appointees, or successors from enforcing or threatening to enforce HB 1205 as to Plaintiff Parker Tirrell, and requiring said Defendants and their employees, agents, appointees or successors to permit Plaintiff Parker Tirrell to try out for and play on the school sports teams designated for girls on the same terms and conditions as other girls.

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff Iris Turmelle, by her next friends and parents Amy Manzelli and Chad Turmelle, moves this Court to preliminarily enjoin Defendants Frank Edelblut, in his official capacity as Commissioner of the New Hampshire Department of Education; Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Laboe, in their official capacities as members of the New Hampshire State Board of Education; Pembroke School District; and Andrew Camidge, Gene Gauss, Kerri Dean, and Melanie Camelo, in their official capacities as members of the Pembroke School Board; and their employees, agents, appointees, or successors from enforcing or threatening to enforce HB 1205 as to Plaintiff Iris Turmelle, and requiring said Defendants and their employees, agents,

appointees or successors to permit Plaintiff Iris Turmelle to try out for and play on the school sports teams designated for girls.

Plaintiffs also move this Court for an order waiving the requirement for bond or security.

This Motion is based on the memorandum of law in its support and the declarations filed with it, as well as the Complaint. Plaintiffs make this motion on the grounds that H.B. 1205 violates Title IX of the Education Amendments of 1972, 42 U.S.C. § 1983, and the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, as set out in the accompanying memorandum of law in support of this Motion. Plaintiffs respectfully request a hearing on this matter.

Respectfully submitted,

PARKER TIRRELL, by her parents and  
next friends SARA TIRRELL and  
ZACHARY TIRRELL,

and

IRIS TURMELLE, by her parents and next  
friends AMY MANZELLI and CHAD  
TURMELLE,

By and through their attorneys,

/s/ Kevin J. DeJong

Kevin J. DeJong (NH Bar No. 17633)

[kdejong@goodwinlaw.com](mailto:kdejong@goodwinlaw.com)

GOODWIN PROCTER LLP

100 Northern Avenue

Boston, MA 02210

(617) 570-1156

Louis L. Lobel\* (MA Bar No. 693292)

[llobel@goodwinlaw.com](mailto:llobel@goodwinlaw.com)

Elaine H. Blais\* (MA Bar No. 656142)

[eblais@goodwinlaw.com](mailto:eblais@goodwinlaw.com)

Chris Erchull (NH Bar No. 266733)

[cerchull@glad.org](mailto:cerchull@glad.org)

Bennett H. Klein\* (MA Bar No. 550702)

[bklein@glad.org](mailto:bklein@glad.org)

GLBTQ LEGAL ADVOCATES & DEFENDERS

18 Tremont Street, Suite 950

Boston, MA 02108

(617) 426-1350

Gilles Bissonnette (NH Bar No. 265393)

[gilles@aclu-nh.org](mailto:gilles@aclu-nh.org)

Henry Klementowicz (NH Bar No. 21177)

GOODWIN PROCTER LLP  
100 Northern Avenue  
Boston, MA 02210

Samira Seraji\* (CA Bar No. 338979)

[sseraji@goodwinlaw.com](mailto:sseraji@goodwinlaw.com)

GOODWIN PROCTER LLP  
601 S. Figueroa Street  
Suite 4100  
Los Angeles, CA 90017

Ben See\* (NY Bar No. 6019202)

[bsee@goodwinlaw.com](mailto:bsee@goodwinlaw.com)

GOODWIN PROCTER LLP  
620 Eighth Avenue  
New York, NY 10018

Emmett Weiss\* (MA Bar No. 713784)

[eweiss@goodwinlaw.com](mailto:eweiss@goodwinlaw.com)

GOODWIN PROCTER LLP  
1900 N Street, N.W.  
Washington, DC 20036

[henry@aclu-nh.org](mailto:henry@aclu-nh.org)

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NEW HAMPSHIRE FOUNDATION  
18 Low Avenue  
Concord, NH 03301  
(603) 224-5591

\*Applications for admission *pro hac vice* to follow.

August 16, 2024